

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ERIC FORSYTHE, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SUN LIFE FINANCIAL INC., et als.,

Defendants.

C.A. No. 04-CV-10584 (GAO)

MOTION TO ADMIT PRO HAC VICE

Now comes Nancy Freeman Gans, a member in good standing of the bar of this Court, and moves the admission in the above-entitled cause of action Jerald D. Bien-Willner, Esquire, of Bernstein Litowitz Berger & Grossmann LLP, of San Diego, California. Attorney Bien-Willner certifies (see Certificate attached to this motion as Exhibit A) that (1) he is a member of the bar in good standing in all jurisdictions where he has been admitted to practice; (2) there are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction; and (3) he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

I have filed an appearance in the above-entitled action.

DATED: October 17, 2005

Respectfully submitted,

MOULTON & GANS, P.C.

/s/ Nancy Freeman Gans

Nancy Freeman Gans (BBO #184540)

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Boston, Massachusetts 02109-4216

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Plaintiffs' Counsel

CERTIFICATE OF SERVICE

I, Nancy Freeman Gans, hereby certify that a true copy of the above document was served upon each party by hand and/or by regular mail, postage prepaid, on October 17, 2005.

/s/ Nancy Freeman Gans
Nancy Freeman Gans